

REMARKS/ARGUMENTS

Claims 1 and 15-34 are pending.

Claims 19, 20, 26, 27, and 33-34 were rejected under 35 U.S.C. 112, first paragraph.

Claims 16, 19, 20, 23, 26-27, 30, and 33-34 were rejected under 35 U.S.C. 112, second paragraph.

Claims 1, 16, 21, 23, 28, 30 were rejected under 35 U.S.C. 103(a) for allegedly being unpatentable over Idleman et al., U.S. Patent No. 6,154,850 in view of DeKoning et al, U.S. Patent No. 6,073,218.

Claims 15, 17, 22, 24, 29, and 31 were rejected under 35 U.S.C. 103(a) for allegedly being unpatentable over Idleman et al., U.S. Patent No. 6,154,850 in view of DeKoning et al, U.S. Patent No. 6,073,218 and in view of Otterness et al., U.S. Patent No. 6,654,831.

It is noted with appreciation that claims 18, 25, and 32 are deemed to recite allowable subject matter. Nonetheless, it is respectfully submitted that the claims as amended herein are patentable over the cited art.

As to the rejections under Section 112, first paragraph, the claims have been amended according to the Examiner's discussion. The rejections under Section 112, first paragraph are believed to be overcome.

As to the rejections under Section 112, second paragraph, the claims are believed to overcome the rejection, having been amended in response to other grounds for rejection.

The present invention is directed to a storage system. An aspect of the present invention is that between first and second controllers in the storage system, the second controller can take over a subset of the logical units that are initially associated with the first controller. The second controller will then control I/O for its own logical units plus the subset of logical units from the first controller. The first controller continues to control its remaining logical units. As recited in amended claim 1, "said second controller takes over control of a subset of said first logical units ... [and] said first controller maintains control over those of said first logical units that are not in said subset of first logical units."

Neither reference to Idleman et al. nor to DeKoning et al. teach or suggest this aspect of the invention. For example, Idleman et al. describe two types of failure, beginning at column 7, line 9: (1) controlled failure and (2) complete failure. In each case, a partner controller provides I/O services that the failed controller was providing. The partner controller does not provide the I/O services using the I/O devices of the failed controller.

DeKoning et al. describe a technique whereby a primary RAID controller is designated from among a plurality of RAID controllers which share access to a logical unit in the disk array. The primary RAID controller can give the other RAID controllers access to portions of the logical unit. *Col. 3, lines 22 - 24, 42 - 46, and 59 and following.* DeKoning et al. do not disclose a second controller which takes control over a subset of logical units, but rather a primary controller which can give access to portions of a single logical unit.


Neither reference considered individually or together teach or suggest the present invention as recited in the amended claims. Reconsideration of the claims in view of the foregoing is respectfully requested.

CONCLUSION

In view of the foregoing, all claims now pending in this Application are believed to be in condition for allowance and an action to that end is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 650-326-2400.

Respectfully submitted,


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